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Attorneys for Plaintiff Saiid Mohamed

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SAIID MOHAMED

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.
and
WELLS FARGO BANK N.A.**

Defendants.

Case No. 8:17-cv-01058-AG-JDE

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL**

Date: July 23, 2018

Time: 10:00 a.m.

Courtroom: 10D

Judge: Hon. Andrew J. Guilford

Plaintiff's counsel, Stephanie R. Tatar, Tatar Law Firm, APC ("Tatar Law Firm") hereby moves this Court for leave to withdraw as counsel for Plaintiff with respect to any remaining claims against Experian Information Solutions, Inc. ("Experian") and Wells Fargo Bank N.A. ("WF"), pursuant to Federal Rule of Civil Procedure Rule 24 and Local Rule 83-2.3.2. In support of said motion, Stephanie R. Tatar avers as follows:

1 1. The undersigned counsel has determined that Stephanie R. Tatar and
2 Tatar Law Firm can no longer best represent Plaintiff's interest in the above
3 captioned lawsuit because of a fundamental disagreement regarding the facts of the
4 case which have recently come to light, and because of Plaintiff's refusal to execute
5 the settlement agreements between Plaintiff and Defendants, Experian and WF,
6 which was not foreseen at the outset of litigation. The settlements were previously
7 agreed to by Plaintiff.
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10 2. As a result of these circumstances, Plaintiff was notified on April 25,
11 2018, April 27, 2018, May 19, 2018 and May 25, 2018 that Tatar Law Firm would
12 be withdrawing as counsel from this action if we received no communication from
13 the Plaintiff, and litigation had to continue.
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15 3. To date, Plaintiff has not executed the settlement agreements between
16 Plaintiff and Defendants, Experian or WF, to the undersigned counsel's knowledge
17 for this matter.
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19 4. To date, Plaintiff has not affirmed his intention to execute the
20 settlement agreements between Plaintiff and Defendants, Experian or WF, to the
21 undersigned counsel's knowledge for this matter.
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23 5. To date, Plaintiff has not retained new counsel to the undersigned
24 counsel's knowledge for this matter.
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1 6. To date, Plaintiff has not affirmed that he desires Tatar Law Firm to
2 continue on as his attorneys in this action to the undersigned counsel's knowledge
3 for this matter.
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5 7. To date, Plaintiff has refused and continues to refuse to communicate
6 with Stephanie R. Tatar, Tatar Law Firm, or any of his attorneys.
7

8 8. Accordingly, the undersigned counsel reasonably believes that
9 Plaintiff, by and through his actions and inactions; does not intend to finalize the
10 settlement agreements; does not desire Tatar Law Firm to continue on as his
11 attorneys; and therefore, has constructively discharged the firm from representing
12 his interests in this lawsuit thus necessitating that Tatar Law Firm withdraw from
13 the case as counsel for Plaintiff.
14

15 9. Plaintiff's last known mailing address and telephone number are as
16 follows:
17

18 Saiid Mohamed
19 1336 63rd Ave.
20 Oakland, CA 94621
21 (510)500-7308
22

23 10. Concurrently with the filing of this motion, the Tatar Law Firm sent via
24 USPS, Priority Mail, a copy of this motion and proposed order to the Plaintiff.
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1 11. For the foregoing reasons, and for good cause shown, Tatar Law Firm
2 respectfully requests that the Court grant its request for leave to withdrawal as
3 counsel for Plaintiff.
4

5
6 Respectfully submitted,

7 **TATAR LAW FIRM, APC**
8

9 /s/ Stephanie R. Tatar

10 Stephanie R. Tatar
11 3500 West Olive Avenue
12 Suite 300
13 Burbank, CA 91505
14 Telephone: (323) 744-1146
15 Facsimile: (888) 778-5695
16 Stephanie@thetatarlawfirm.com

17 *Attorney for Plaintiff Saiid Mohamed*
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Date: June 11, 2018

CERTIFICATE OF SERVICE

Saiid Mohamed v. Experian Information Solutions, et al

Case No. 8:17-cv-01058-AG-JDE

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause.

On June 11, 2018, I served a true copy of the

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF

☐ By personally delivering it to the person(s) indicated below in the manner as provided in FRCivP5(B);

☒ By depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following via Priority Mail to the following:

Saiid Mohamed
1336 63rd Ave.
Oakland, CA 94621

☐ By serving a pdf copy via e-mail transmission to the following;

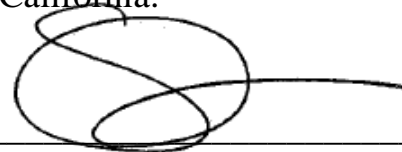
☒ By ECF: On this date, I electronically filed the preceding document(s) with the Clerk of the Court using the CM/ECF system, which sent electronic notification of such filing to all other parties appearing on the docket sheet;

Jennifer Sun
Jones Day
3161 Michelson Drive
Suite 80
Irvine CA 92612
JenniferSun@jonesday.com

1 Alisa A Givental
2 Severson & Werson APC
3 One Embarcadero Center
4 Ste 2600
5 San Francisco CA 94111
6 aag@severson.com

7 I declare under penalty of perjury that the above is true and correct, and that
8 I am employed in or by the office of a member of the bar of this Court at whose
9 direction the service was made.

10 Executed on June 11, 2018, at Burbank, California.

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13 Stephanie R. Tatar
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